

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

IN RE SUBPOENA FOR DOCUMENTS
ISSUED TO PENINSULA PATHOLOGY
ASSOCIATES,

Case No. 4:22-mc-00001

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE OBJECTION TO THE
MAGISTRATE JUDGE'S ORDER, ECF NO. 11**

Respondent American International Industries (“A-I-I”), by counsel, moves the Court for an extension of time up to and including Wednesday, January 11, 2023, by which to file its objection to the Magistrate Judge’s Order filed December 23, 2022, concerning Peninsula Pathology Associates’ Motion to Quash (ECF No. 11). A-I-I states as follows in support of this motion:

1. This Court issued its order on Peninsula Pathology Associates’ Motion to Quash on December 23, 2022. A-I-I’s deadline to file objections to the order is January 6, 2023.
2. Counsel for A-I-I has been working diligently to prepare its objections to said order. However, the time period in which to respond included a number of holidays and counsel for A-I-I had numerous family and professional obligations during late December and early January. In addition, A-I-I is retaining additional counsel to assist in the preparation of the objections, and new counsel requires additional time to prepare.
3. A-I-I is requesting a modest five (5) day extension of its time in which to file objections to January 11, 2023.

4. Counsel for A-I-I have conferred with counsel for Peninsula Pathology Associates and Peninsula Pathology Associates does not oppose this motion.

WHEREFORE, A-I-I requests, for good cause shown, that the Court grant this Unopposed Motion for Extension of Time and enter **Exhibit 1**, an electronically endorsed copy of the Proposed Order.

Dated: January 5, 2023

Respectfully submitted,

AMERICAN INTERNATIONAL INDUSTRIES
By Counsel

/s/ Robert E. Thackston

Robert E. Thackston (VSB #27385)
LATHROP GPM LLP
2101 Cedar Springs Road, Suite 1400
Dallas, TX 75201-2134
Telephone: (469) 983-6100
E-Mail: robert.thackston@lathropgpm.com

Eric D. Cook (VSB #68054)
WILLCOX SAVAGE, P.C.
440 Monticello Avenue, Suite 2200
Norfolk, Virginia 23150
Telephone: (757) 628-5500
Facsimile: (757) 628-5566
E-Mail: ecook@wilsav.com

Counsel for American International Industries

CERTIFICATE OF SERVICE

I certify that on this 5th day of January, 2023, a true and correct copy of the foregoing was served on all counsel of record via Notice of Electronic Filing by filing with the Court's CM/ECF system.

/s/ Robert E. Thackston

